

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 17-mc-151-LPS

OI EUROPEAN GROUP B.V.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 19-mc-290-LPS

**OI EUROPEAN GROUP B.V.'S RESERVATION OF RIGHTS
WITH RESPECT TO SPECIAL MASTER'S FINAL RECOMMENDATION**

OI European Group B.V. ("OIEG") respectfully submits this reservation of rights with respect to the *Special Master's Final Recommendation* [D.I. 1837], and states as follows:¹

As of the date hereof, OIEG does not intend to raise any objections to the Final Recommendation that would require discovery. However, OIEG expressly reserves all rights to object to the Final Recommendation in the event of any developments or circumstances that could result in, including but not limited to: (i) a reduction in the Purchase Price or in the cash consideration payable to OIEG as an Additional Judgment Creditor on account of its judgment; (ii) a potential delay in the Closing; (iii) the inability of the Recommended Bidder to close the

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Final Recommendation.

Proposed Sale Transaction and make the payments in accordance with the terms of the Stock Purchase Agreement; or (iv) a bid that may be higher or otherwise better than the Final Recommendation.

Dated: July 7, 2025

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